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10 **BEFORE THE**
DEPARTMENT OF CONSUMER AFFAIRS
BUREAU OF VOCATIONAL NURSING AND PSYCHIATRIC TECHNICIANS
11 **STATE OF CALIFORNIA**

12 In the Matter of the Accusation Against:

Case No. VN 2007-1100

13 **GLORIA J. VELASQUEZ**

14 9638 Northrup Drive
Reno, Nevada 89521

A C C U S A T I O N

15 Vocational Nurse License No. VN 197066

16 Respondent.
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18 Teresa Bello-Jones, J.D., M.S.N., R.N. ("Complainant") alleges:

19 **PARTIES**

20 1. Complainant brings this Accusation solely in her official capacity as the
21 Executive Officer of the Bureau of Vocational Nursing and Psychiatric Technicians ("Bureau"),
22 Department of Consumer Affairs.

23 **License History**

24 2. On or about October 17, 2001, the Bureau issued Vocational Nurse
25 License Number VN 197066 ("license") to Gloria J. Velasquez ("Respondent"). The license will
26 expire on April 30, 2009, unless renewed.

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1 **JURISDICTION**

2 3. This Accusation is brought before the Director of Consumer Affairs
3 ("Director") for the Bureau, under the authority of the following laws. All section references are
4 to the Business and Professions Code ("Code") unless otherwise indicated.

5 4. Code section 2875 states, in pertinent part, that the Bureau may discipline
6 the holder of a vocational nurse license for any reason provided in Article 3 (commencing with
7 Code section 2875) of the Vocational Nursing Practice Act.

8 5. Code section 477, subdivision (a), provides that a "[b]oard" includes
9 "bureau," "commission," "committee," "department," "division," "examining committee,"
10 "program," and "agency."

11 6. Code section 101.1, subdivision (b)(1), provides that "[i]n the event that
12 any board, as defined in Section 477, becomes inoperative or is repealed in accordance with the
13 act that added this section, or by subsequent acts, the Department of Consumer Affairs shall
14 succeed to and is vested with all the duties, powers, purposes, responsibilities and jurisdiction not
15 otherwise repealed or made inoperative of that board and its executive officer."

16 7. Code section 118, subdivision (b), states, in pertinent part, that the
17 expiration of a license shall not deprive the Bureau of jurisdiction to proceed with a disciplinary
18 action during the period within which the license may be renewed, restored, reissued or
19 reinstated. Under Code section 2892.1, the Bureau may renew an expired license at any time
20 within four years after the expiration.

21 **STATUTORY PROVISION**

22 8. Code section 2878.8 states:

23 The Board may deny any application or may suspend or revoke any
24 license issued hereunder this chapter based upon the denial of licensure,
25 suspension, restriction, or other disciplinary action of a license by another
26 state, any other government agency, or by another California health care
27 professional licensing board. A certified copy of the finding shall be
28 conclusive evidence of that action provided that, if from another state, the
findings establish an act which if committed in California would be
grounds for discipline.

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1 PRAYER

2 WHEREFORE, Complainant requests that a hearing be held on the matters herein
3 alleged, and that following the hearing, the Director of Consumer Affairs issue a decision:

- 4 1. Revoking or suspending Vocational Nurse License Number VN 197066,
5 issued to Gloria J. Velasquez;
6 2. Ordering Gloria J. Velasquez to pay the Bureau the reasonable costs of the
7 investigation and enforcement of this case, pursuant to Code section 125.3;
8 3. Taking such other and further action as deemed necessary and proper.
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10 DATED: September 5, 2008

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13 TERESA BELLO-JONES, J.D., M.S.N., R.N.
14 Executive Officer
15 Bureau of Vocational Nursing and Psychiatric Technicians
16 Department of Consumer Affairs
17 State of California
18 Complainant
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